

March 27, 2007

BY E-MAIL

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

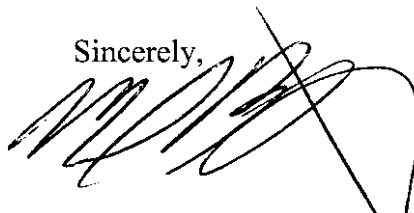
EX PARTE PRESENTATION --Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67; Petition for Declaratory Ruling on Video Relay Service Interoperability CG Docket No. 03-123

Dear Ms. Dortch:

On March 26, 2007, Sprint Nextel met with members of the FCC's Consumer and Governmental Affairs Bureau (CGB) and Wireline Competition Bureau (WCB). Representing Sprint Nextel were Paul Ludwick, Tracy Goddard and Scott Freiermuth all of whom participated via conference call and the undersigned. Representing CGB were Cathy Seidel, Jay Keithley, Greg Hlibok, Cheryl King and Pam Slipakoff. Representing WCB were Marcus Maher, Marilyn Jones, Ben Childers and Amy Bender. The purpose of the meeting was to enable Sprint Nextel to explain the numbering solution for VRS and other IP-based TRS services that Sprint Nextel and others have been championing before the NANC and INC. The enclosed document sets forth the broad outlines of that solution. Sprint intends to submit a more detailed explanation of the proposal together with additional documents into the record of this proceeding in the near future.

If you have any questions, please contact me.

Sincerely,



Attachment

cc: Cathy Seidel (by email)
Jay Keithley (by email)
Greg Hlibok (by email)
Cheryl King (by email)
Pam Slipakoff (by email)

Marcus Maher (by email)
Marilyn Jones (by email)
Ben Childers (by email)
Amy Bender (by email)

VRS Numbering Solution



Mike Fingerhut, Paul Ludwick,
Tracy Goddard, Scott Freiermuth

3/26/07

VRS Numbering Solution

Overall Goals of Sprint Approach

Telephone numbers for VRS consumers should be functionally equivalent to hearing users.

- Ten Digit Geographic Telephone Numbers (TNs)

- Numbers should be incorporated into generally accessible directory assistance

Approach should be extended to other forms of Internet-based relay services including IP, IM, IP CapTel and future internet based relay services.

Easy for deaf consumers

- Get a number and select provider (s)

- Switch from one provider to another.

- Make deaf to deaf calls

Numbering is a core functionality

- Should not be a barrier into the market

- Should not be a competitive element



Sprint Approach vs. Neustar Approach

	Sprint Nextel	Neustar
Responsible for obtaining TNS	Neutral 3 rd party administrator who maintains agreements with LECs	VRS/IP providers through individual agreements with LECs
Administration of TNS (assigning, porting)	Neutral 3 rd party administrator	Individual VRS/IP providers
Centralized database	Contains actual IP addresses of users	Centralized database contains only URI. VRS/IP providers and deaf to deaf calls are reliant on interconnections with other VRS/IP providers to get IP addresses of customers.



Obtaining and Administering TNs

Neutral Third Party Approach

Economy of Scale

- One database administrator establishes relationships with all LECs to obtain numbers for all Internet-based relay users.
- Less costly.

Conservation of numbers

- Free distribution to end users
- Easier to identify and curb potential misuse

One point of contact for customers

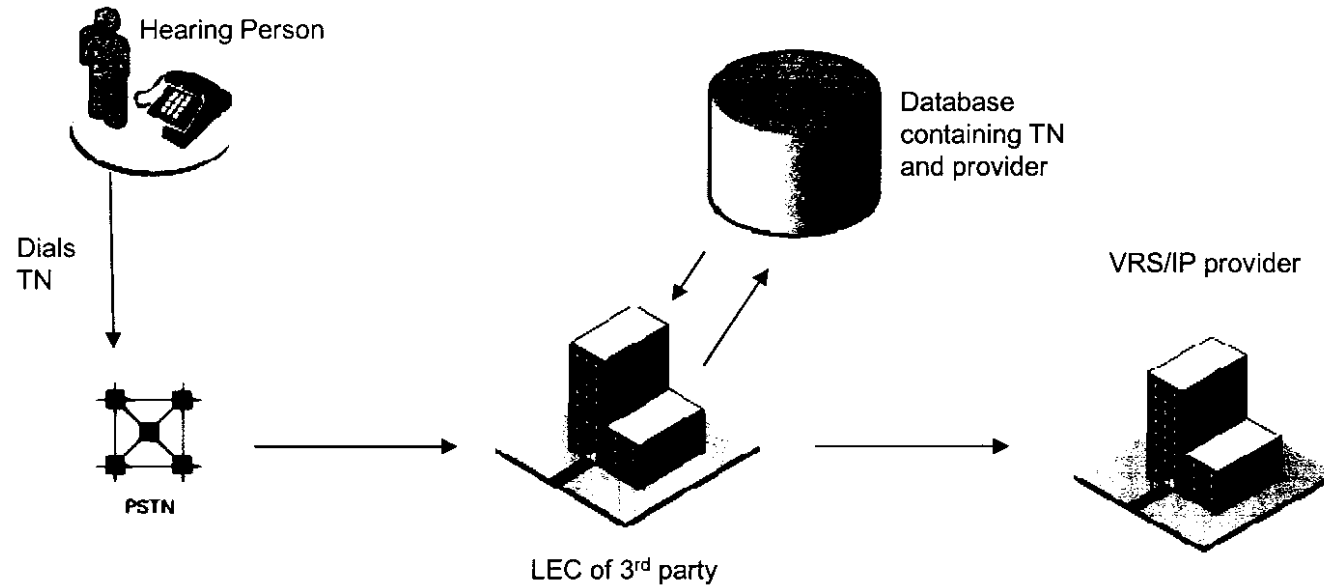
- Available for all forms of relay (VRS, IP, Wireless access, etc)
- Faster porting from one relay provider to another

Provider Neutral

- Less risk of slamming and/or pressuring customers
- Customers choose relay based on relay service rather than numbering as all providers have access to the same numbers



Basic Inbound Call Flow



1. Hearing person dials ten digit geographic TN (e.g. 913-555-5555)
2. Third party and/or the third party's LEC routes the call to the preferred VRS/IP provider.
3. The VRS/IP provider accepts the call.



California Relay Service

Example of Consumer Choice

Multi-vendor Relay Service including:

- Multiple call center / service providers
- Third party routes users according to preferences including-
 - Preferred call center provider
 - Type of communication used (e.g. TTY, voice, HCO, STS, VCO)
 - Language



Hearing Provider Selects Relay Provider Inbound Call Flow

1. Hearing person dials toll free number of preferred relay provider.
2. The appropriate VRS/IP provider accepts the call.
3. The hearing person supplies the ten digit number of the deaf person they are calling.
4. The VRS/IP provider queries the centralized database for the IP address or IM name of the deaf consumer (as described in the next two slides).



VRS Numbering Solution

Neutral 3rd Party Centralized Database

Centralized database including:

- TN of Deaf user
- IP address or IM identification of user
- Type of relay service (VRS, IP, IM, IP CapTel, etc)
- Address and/or location information

Allows interoperability without requiring each VRS/IP relay provider to interconnect with all other relay providers

- Reduces costs associated with interconnections between relay providers

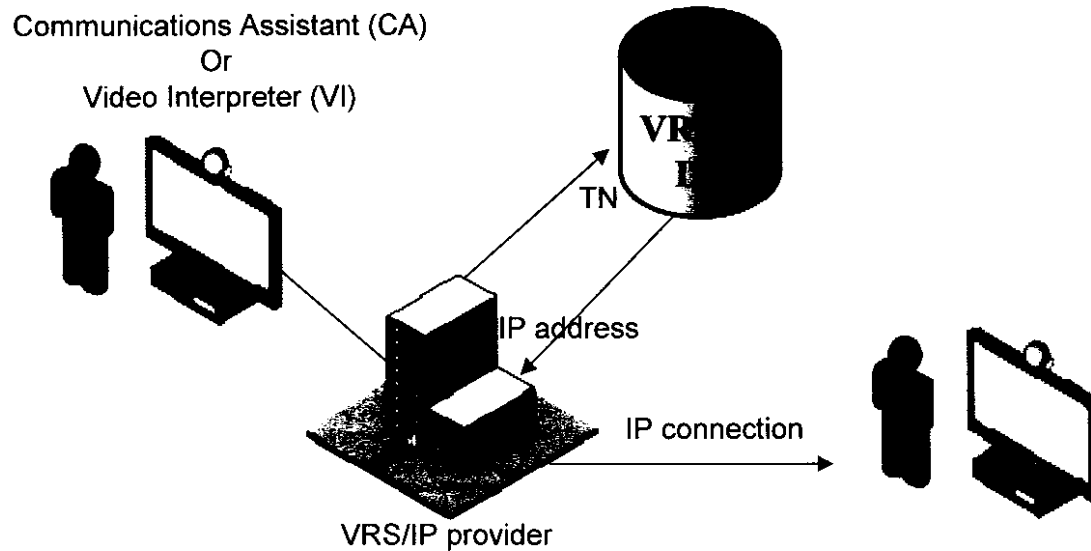
- Reduces interdependency

- Offers service options when one provider's equipment and/or database is offline which is especially important in e911 situations

Provides call-back number to PSAPs in emergencies and may enable the VRS/IP Relay provider to furnish the address of the deaf or hard of hearing person to the PSAPs.



Basic Outbound Call Flow



1. VRS/IP provider receives inbound voice call.
2. VRS/IP provider queries centralized database and/or internal company DB based on incoming TN.
3. DB returns IP address of deaf person.



Required Steps and Outstanding Issues

- Industry Number Committee (INC) including Sprint
 - Developing a document to send to the FCC to address TN issue and interoperability issue
 - Document scheduled to be completed no earlier than Summer '07
- FCC
 - Establish neutral third party for the ordering/administration of TNs and centralized database for maintaining IP addresses.
 - Funding mechanism
 - Direct reimbursement from TRS fund for third party and/or bill relay providers per query.
- Relay Providers
 - Establish interconnections with third party database

